SUBJECTSIP Inspection of Thomas Steel Drum
Fort Worth, Texas

DATE: February 17, 1976

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Compliance Section, S&A Division (6ASASC)

TO: Thomas P. Harrison
Director, Enforcement Division (6AE)

THOMAS STEEL DRUM

THRU: Dr. Oscar Ramirez
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The writer was accompanied on this inspection by Mr. J. Sandel, Air Control Board (TACB), and Mr. J. C. Kinchen, City of Fort Worth, Department of Air Pollution Control.

This facility reconditions 55 gal. drums of the type with a removable cover (open top). The process consists of the following sequence of operations.

1. Cutting the head off the drum (if domed).

2. Beading

Burning the residue out of the drum in a reclamation furnace also referred to as burn out oven.

4. Straightening the drum.

 Removing the scale in a wheelabrator shot blast enclosure with baghouse collector.

6. Painting the interior of the drum.

Baking in the paint in a gas fired oven at 450°F.

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8. Painting the exterior.

The reclamation furnace has 12 burners each having a capacity of 5,000,000 BTU's. The reclamation furnace is equipped with an afterburner which is supposed to destroy the particles from the furnace. The afterburner has 8 burners, each having a capacity of 1,000,000 BTU's. A 10,000 CFM I.D. fan pulls the gas and particulates from the reclamation furnace through the afterburner.

Prior to being placed on the conveyor for burn out, the drums are emptied into a dumpster which when full is hauled to a landfill. If, after the initial emptying, some material remains in the drum, the drum is turned up and allowed to drain on the ground. This action creates an unsightly mess on the ground as the drums can and do contain chemicals, paints, solvents, etc. According to the plant superintendent, the area is supposed to be kept clean but it was evident that good housekeeping practices were not being employed.

EPA Form 1320-6 (Rev. 6-72)

Another problem area, are the large cracks and holes in the hood and shroud which carry the gases and particulates from the reclamation furnace to the afterburner. Gray/black smoke was escaping from these holes and cracks discharging into the enclosed work area and on to the ambient. The superintendent stated the company plans to extend the furnace and repair the holes and cracks in the near future although no date was given for the repairs.

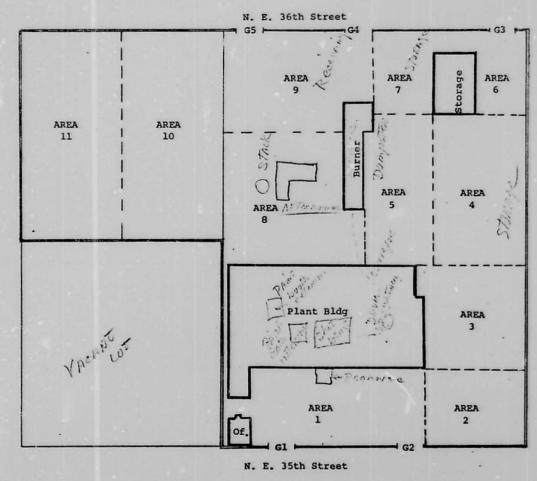
Another area of concern was the paint booth used to paint the interior of the drum. A fan is used to pull off the airborne solids and associated gases which discharge directly to the ambient as no filter is incorporated in the system.

No visible emissions were observed coming from the afterburner stack or the wheelabrator baghouse, the only two point sources within the plant where visible emissions might occur.

Most of the floor area of the plant was covered with dust particles as was the area where the drums are received and emptied.

The entire plant and grounds represent a source of fugitive emissions and as such should be closely monitored by the city of Fort Worth.

Enclosure



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